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NATIONAL CONSUMERS LEAGUE

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Before the Federal Communications Commission Washington, DC 20554

In the Matter of

Application by New York Telephone
Company (d/b/a Bell Atlantic -
New York, Bell Atlantic
Communications, Inc., NYNEX Long
Distance Company,)
and Bell Atlantic Global Networks,
Inc.,
for Authorization to Provide In-
Region,
InterLATA Services in New York

CC Docket 99-295

Comments of The National Consumers League

October 19, 1999
Linda F. Golodner, President
National Consumers League

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The National Consumers League appreciates the opportunity to comment in support of New York Telephone Company (d/b/a Bell Atlantic - New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc. (hereinafter referred to as Bell Atlantic) filing requesting FCC authorization to provide in-region, interLATA services in New York.

I. Statement of Interest

The National Consumers League is a private, nonprofit organization that has represented consumers in the marketplace and the workplace since its founding in 1899. In 1992, the League responded to the growing menace of telemarketing fraud by creating the National Fraud Information Center, a unique hotline service. Through a toll-free number, 1-800-876-7060, or the www.fraud.org web site launched in 1996, consumers can get advice about telephone solicitations and report possible fraud. Fraud reports are relayed to a database maintained by the Federal Trade Commission and the National Association of Attorneys General. In addition, and even more important, the advice that consumers receive from the NFIC helps them recognize the danger signs of fraud and avoid being victimized in the future.

II. Introduction and Summary

The National Consumers League believes that Bell Atlantic's entry into the long distance market in the state of New York is a positive step, for many reasons.

Increased long distance competition in New York will help to make the promise of the 1996 Telecommunications Act

a reality for consumers. In addition to supporting increased competition, NCL cites that the employees of the company have union representation and have been able to exercise their right to bargain collectively. Bell Atlantic has also demonstrated a commitment to consumer education.

III. Benefits of Increased Competition

For more than 100 years, the National Consumers League has advocated for increased consumer choice in the marketplace. Competition has a tremendous potential benefit to consumers, and this rule holds true in the telecommunications arena as well.

More competition in the long distance market is even more important now, as we see a proposed MCI WorldCom/Sprint merger looming. According to the Communications Workers of America, the proposed merger would concentrate 80 percent of the long distance telephone marketplace with two companies, the new MCI/Sprint and AT&T. Consumers deserve more choices in the long distance marketplace, not fewer choices.

As companies grow and expand into new markets, their responsibility is to help protect consumer interests, not limit choice. History has demonstrated that the pressures resulting from increased competition drive companies to become more innovative in services and products they offer. In the long distance market, we have seen competition result in reduced prices, from 10-cents a minute to recent offers of even lower rates.

IV. Consumer Protection

Companies who wish to play a leading role also have a responsibility to protect consumers in order to maintain their confidence in the marketplace.

Over the past several years, the National Consumers League has educated the public about telephone-related fraud and advocated for appropriate consumer protections. Telephone-related fraud reported to the NFIC this year is dominated by "cramming," the placement of unauthorized charges on consumers' telephone bills, and "slamming," the unauthorized switching consumers' long distance service.

At one point telephone "cramming" skyrocketed to first place among the more than fifty categories of telemarketing scams reported to the National Fraud Information Center. Bell Atlantic took decisive action in the interest of its customers, and in the interests of all consumers, by assuming industry leadership in fighting this scam. We have seen the direct impact of its actions, with a reduction in the number of cramming complaints from the Bell Atlantic region.

Bell Atlantic established a National Consumer Advisory Board, a self-governing body that devises its own guidelines, sets its own agenda and advises the corporation on a wide-range of consumer issues. Advisory members have discussed company policies on privacy, fraud, and truth-in-billing as well as other telephone issues. The National Consumers League is a member of that Board and serves as a co-chair. Bell Atlantic is also an active member of the Alliance Against Fraud in Telemarketing & Electronic Commerce (AFTEC), coordinated by the National Consumers League. Members of the Alliance -- from government, law enforcement, consumer advocacy, and businesses -- are

united in their commitment to combating telemarketing and Internet fraud through consumer education.

V. Union Jobs

The National Consumers League would like to reference the supportive comments of Communications Workers of America. A healthy job market goes hand-in-hand with a healthy consumer sector. As a consumer organization concerned about marketplace and workplace issues, we hope that Bell Atlantic will continue to retain their skilled, unionized employee-base and expand it as they offer new services. For those of us that support union labor, there is very limited choice in long distance companies. If Bell Atlantic is allowed to provide this service in New York and other states, we will have a choice.

VI. Conclusion

NCL urges the Commission's approval of Bell Atlantic's 271 application. Consumers have been waiting for the promise of the Telecommunications Act to become a reality. They deserve true competition, with more, not fewer choices in the long distance marketplace. Workers and consumers that support the ideals of the labor movement want more choices in the marketplace as well.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Linda F. Golodner', is written over a horizontal line.

Linda F. Golodner, President
National Consumers League